IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

KRISTIN PEREZ HAINES CIVIL ACTION

V.

RODNEY GENE LEE and NO: 02-CV-4432

NORTHSTAR TRUCKING SERVICES, INC.

PLAINTIFF'S RESPONSE TO DEFENDANT'S AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

Denied. As a conclusion of law to which no response or pleading is required.

SECOND AFFIRMATIVE DEFENSE

Denied. As a conclusion of law to which no response or pleading is required.

THIRD AFFIRMATIVE DEFENSE

Denied. As a conclusion of law to which no response or pleading is required.

FOURTH AFFIRMATIVE DEFENSE

Denied. As a conclusion of law to which no response or pleading is required.

FIFTH AFFIRMATIVE DEFENSE

Denied. As a conclusion of law to which no response or pleading is required.

SIXTH AFFIRMATIVE DEFENSE

Denied. As a conclusion of law to which no response or pleading is required.

SEVENTH AFFIRMATIVE DEFENSE

Denied. As a conclusion of law to which no response or pleading is required.

EIGHTH AFFIRMATIVE DEFENSE

Denied. As a conclusion of law to which no response or pleading is required.

NINTH AFFIRMATIVE DEFENSE

Denied. As a conclusion of law to which no response or pleading is required.

TENTH AFFIRMATIVE DEFENSE

Denied. As a conclusion of law to which no response or pleading is required.

ELEVENTH AFFIRMATIVE DEFENSE

Denied. As a conclusion of law to which no response or pleading is required.

WHEREFORE, Plaintiff, Kristin Haines, demands judgement in her favor and relief as set forth in her Complaint.

LAW OFFICES OF GREGG R. DURLOFSKY

BY:

Gregg R. Durlofsky, Esquire I.D.# 66253 111 W. Germantown Pike Plymouth Meeting, PA 19462 610-834-9483 Attorney for Plaintiff